

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

I, Bryce J. Ferrara, being sworn, state:

Introduction and Agent Background

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") since January 2019 and assigned to the Boston Division since May 2019. More specifically, I am currently assigned to the FBI Boston Division's Violent Crime Task Force ("VCTF"), which is comprised of law enforcement personnel from the FBI, Boston Police Department ("BPD"), Massachusetts State Police ("MSP"), Braintree, Malden, Saugus, Somerville, and Dedham Police Departments. As a Special Agent with the FBI, I have conducted investigations dealing with bank and commercial robberies and burglaries, Hobbs Act, extortion, and crimes against persons. I have also received specialized training regarding investigative techniques, evidence collection, and evidence preservation.

2. I am aware that Title 18, United States Code, Section 2113(a) makes it a crime for anyone to use force and violence, or intimidation, to take from the person of another, money or any other thing of value belonging to or in the care, custody, control, management, or possession of any federally-insured financial institution.

3. I make this affidavit in support of a criminal complaint charging Stephen D. Williams ("Williams"), DOB: xx/xx/1964, with

the robbery of a branch of the Santander Bank located at 575 Boylston Street Boston, Massachusetts on November 13, 2020. On the date of the robbery the deposits of the Santander Bank were insured by the Federal Deposit Insurance Corporation. The facts stated herein are based on my own personal involvement with this investigation, as well as from information provided to me by other law enforcement officers involved in the investigation. In submitting this affidavit, I have not included each and every fact known to me about this investigation; rather, I am only submitting enough evidence necessary to establish the requisite probable cause.

INVESTIGATION

4. On November 13, 2020, at approximately 12:24 p.m., an unidentified male ("the robber") entered a branch of the Santander Bank located at 575 Boylston Street, Boston, Massachusetts. The robber approached a teller and handed her a note which stated words to the effect, "Give me all the cash I have a gun." The robber then stated, words to the effect, "Give me the money, the first and second drawer, don't give me the bait, I see the bait don't give me that." The robber additionally demanded a bag from the teller. The teller told the robber she did not have a bag. The teller then proceeded to give the robber cash from her drawer. The robber retrieved the demand note and took the bank's money,

which he, the robber, stuffed inside his coat, and he exited the bank.

5. Following the robbery, the teller was interviewed and relayed facts consistent with those reflected in the previous paragraph. The teller described the robber as a black male, approximately thirty to thirty five years of age, approximately five feet five inches to five feet six inches tall, and wearing a grey and black knit hat, a black surgical mask, a navy-blue jacket, and a black sweater. The teller also stated that the robber was possibly wearing gloves.

6. Bank surveillance cameras were functioning and operating on the date of the robbery. The cameras captured images of the robber inside the bank and interacting with the teller. The cameras captured images of the robber consistent with the teller's description. I have also observed this video and the robber appears to be a short black male, wearing a dark knit hat, a dark blue jacket, blue latex gloves, dark pants and white sneakers. In this video I also observed the teller handing the robber what appears to be large sums of US currency wrapped in bands to the robber.

7. The bank conducted a post-robbery audit and determined that the robber had taken \$7,643 in US currency during the robbery.

THE ARREST OF STEPHEN D. WILLIAMS

8. Members of the Boston Police responded to the robbery and, after interviewing various bank personal and others, issued a police transmission ("CAD") concerning the robbery. The CAD described the robber as a black male, 30's, 5'5" tall, 170 pounds, black knit hat, black face mask, navy jacket, blue pants and that he had put money inside his jacket.

9. A few minutes after issuing the CAD, the Boston Police received additional information from an individual known to law enforcement ("the witness"). The witness stated that he had just observed an individual walking on Waltham Street heading towards Washington Street. The witness stated that this individual was counting money which had bands on it. The witness stated that he observed this individual remove his jacket, pull a black trash bag from the street trash, and place the jacket inside the black trash bag and walk away on Waltham Street carrying the black trash bag.¹ The witness described this individual as a male wearing a black long-sleeved shirt and jeans and carrying a black trash bag. This information was additionally transmitted by Boston Police.

10. A few minutes later, a Boston Police Officer, who had received the transmissions referenced above, observed an

¹ The location is approximately .7 miles from the Santander Bank on Boylston Street.

individual fitting the description on Albany Street.² The officer noted that the individual was a short black male, wearing a black long sleeved shirt, blue jeans, white sneakers, and a green face covering. The officer also noted that the individual was carrying a black trash bag. At this time two additional Boston Police Officers arrived and they approached the individual. The officers asked the individual what he was carrying in the trash bag and he, the individual responded, "I'm homeless, just clothes." The officers then asked the individual if he would show them the contents of the bag. The individual then untied the bag and opened it for the officers. The officers immediately observed a blue jacket inside the trash bag. The individual then fled leaving the black trash bag behind. During his flight the individual ran into a person riding a bike and knocked him, the bicyclist, to the ground.

11. The officers caught and detained the individual, later identified as Williams. Williams was placed into custody, pat-frisked, and was given his *Miranda* warnings. During the pat-frisk the officers recovered a large sum of US currency from the front pocket of Williams pants.

² The location on Albany Street where Williams was eventually detained is approximately .5 miles from the location where the witness, discussed in Paragraph #9, stated he observed an individual with a sum of cash and removing his jacket.

12. The black trash bag discussed above, was seized by law enforcement and they recovered a large amount of US currency, a dark colored knit hat, and a blue jacket. Inside the blue jacket's pockets law enforcement recovered an additional sum of US currency; a pair of blue latex gloves; a note written on white paper with the words, "I have a gun ,It's a robbery. Give me the money now;" a Massachusetts Department of Transitional Assistance Card in the name of Stevie Williams; and various paper money bands.

13. In total, law enforcement recovered \$7538 in US currency from Williams' person, the blue jacket, and from the black trash bag.

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CONCLUSION

14. Based on the foregoing, I submit there is probable cause to believe that, Stephen D. Williams, by force and violence, and by intimidation took from the person and presence of another, money in the care, custody, control, management and possession of the Santander Bank located at 575 Boylston Street, Boston, Massachusetts, a bank whose deposits were insured by the Federal Deposit Insurance Corporation in violation of 18 U.S.C. § 2113(a).

/s/ Bryce J. Ferrara
Bryce J. Ferrara, Special Agent
Federal Bureau of Investigation
Sworn telephonically pursuant
To Fed.R.Crim.P.41 (d)(3)

Subscribed and sworn to telephonically in accordance with Federal Rule of Criminal Procedure 4.1 on this **Nov 18, 2020** of November 2020.



HONORABLE JUDITH G. DEIN
United States Magistrate Judge